REMARKS

I.   Claims 1, 4-9, 11, 12, 15-20, 22, 23, 26-31, and 33 are Allowable

The Office has rejected claims 1, 4-9, 11, 12, 15-20, 22, 23, 26-31, and 33, at paragraphs 4-13 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent Application Publication No. 2001/0047332 ("Gonen-Friedman") in view of U.S. Patent Application Publication No. 2007/0203771 ("Caballero"). Applicant respectfully traverses the rejections.

A. Claims 1, 4-9 and 11

It is clearly established that the mere fact that the claimed invention is within the capabilities of one of ordinary skill in the art is not sufficient, by itself, to establish *prima facie* obviousness. *See* MPEP 2143.01. Furthermore, the level of skill in the art cannot be relied upon to provide the suggestion to modify or combine the references. *See, B.G., Al-Site Corp., v. VSI Int'l Inc.,* 174 F.3d 1308, 15 USPQ2d 1161 (Fed. Cir. 1999). The threshold question, therefore, is not whether a person having skill in the art would be able to make the claimed invention. Rather, a *prima facie* case of obviousness requires some suggestion or motivation <u>in the references</u> to combine the reference teachings. Gonen-Friedman discloses a method for customers to go online to dispute an account balance or an invoice. *See* Gonen-Friedman, paragraph [0008]. Caballero discloses a method to generate price quotes for combinations of services and products. *See* Caballero, paragraph [0004]. Thus, it is not clear why one skilled in the art would combine the method to dispute account balances of Gonen-Friedman with the method to generate price quotes of Caballero. Further, there is no suggestion or motivation in the references to combine them.

Moreover, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest the specific combination of claim 1. For example, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest providing a user interface that provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 1. The Office Action admits that Gonen-Friedman does not disclose that the user interface

provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type. The Office asserts that the Abstract of Caballero discloses this feature. *See* Office Action, page 4. The Applicant respectfully disagrees.

In contrast with claim 1, Caballero discloses a system to access a customer's account information, service profile, quotes, and order. *See* Caballero, Abstract. Caballero teaches that account information can be entered and updated. Quotes are generated for various configurations of products and services. The quotes can then be converted to an order. *See* Caballero, Abstract. Accordingly, with Caballero, the system is not responsive to a user's questions regarding a transaction, as in claim 1. Instead, Caballero is directed to "processing complex orders" and to "validate customer orders for complex combinations of products and services." *See* Caballero, paragraph [0004]. Caballero does not disclose multiple user-selectable links to multiple destinations for multiple question types <u>per line item to facilitate routing a user request to an appropriate destination</u> based on its question type, as in claim 1. Therefore, the cited portions of Gonen-Friedman and Caballero, separately or in combination, do not disclose or suggest every element of claim 1. Hence, claim 1 is allowable.

The Office Action rejected claims 4-9 and 11 as being unpatentable over Gonen-Friedman. *See* Office Action, paragraphs 6-11. However, claims 4-9 and 11 depend from claim 1, which the Applicant has shown to be allowable. Hence, the cited portions of Gonen-Friedman and Caballero fail to disclose or suggest at least one element of each of claims 4-9 and 11. Accordingly, claims 4-9 and 11 are also allowable, at least by virtue of their dependence from claim 1.

Further, the dependent claims recite additional features that are not disclosed or suggested by the cited portions of Gonen-Friedman. For example, the cited portions of Gonen-Friedman do not disclose or suggest multiple user-selectable links for a line item that include a first link to question the line item and a second link to dispute the line item, as in claim 4. Instead, Gonen-Friedman discloses that the user can dispute <u>the invoice</u> (not a line item) in a first step (step S1) and select a reason code in a second step (step S2a). *See* Gonen-Friedman, paragraph [0037]. However, Gonen-Friedman does not disclose a first link to question <u>the line</u>

item and a second link to dispute the line item as recited in claim 4. For this additional reason, claim 4 is allowable.

The cited portions of Gonen-Friedman do not disclose or suggest multiple user-selectable links that include a first link to question the line item and a second link to correct the line item, as recited in claim 5. As explained above, Gonen-Friedman discloses that the user can dispute the invoice (not a line item) in a first step (step S1) and select a reason code in a second step (step S2a). *See* Gonen-Friedman, paragraph [0037]. However, Gonen-Friedman does not disclose a first link to question the line item and a second link to correct the line item. For this additional reason, claim 5 is allowable.

Similarly, the cited portions of Gonen-Friedman do not disclose or suggest multiple user-selectable links that include a first link to question an amount of a product or a service associated with the line item and a second link to question a billing rate associated with the line item, as recited in claim 6. *See* Gonen-Friedman, paragraph [0037]. For this additional reason, claim 6 is allowable.

B. Claims 12, 15-20 and 22

The Office has rejected claims 12, 15-20 and 22, at paragraph 12 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Gonen-Friedman in view of Caballero. However, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest the specific combination of claim 12. For example, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claim 12. The Office Action admits that Gonen-Friedman does not disclose that the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type. The Office asserts that the Abstract of Caballero discloses this feature. *See* Office Action, page 4. The Applicant respectfully disagrees.

As explained above, Caballero discloses a system to access a customer's account information, service profile, quotes, and order. *See* Caballero, Abstract. Caballero teaches that account information can be entered and updated. Quotes are generated for various configurations of products and services. The quotes can then be converted to an order. *See* Caballero, Abstract. Accordingly, with Caballero, the system is not responsive to a user's questions regarding a transaction, as in claim 12. Instead, Caballero is directed to "processing complex orders" and to "validate customer orders for complex combinations of products and services." *See* Caballero, paragraph [0004]. Caballero does not disclose multiple user-selectable links to multiple destinations for multiple question types <u>per line item to facilitate routing a user request to an appropriate destination</u> based on its question type, as in claim 12. Therefore, the cited portions of Gonen-Friedman and Caballero, separately or in combination, do not disclose or suggest every element of claim 12. Hence, claim 12 is allowable.

The Office Action rejected claims 15-20 and 22 as being unpatentable over Gonen-Friedman. *See* Office Action, paragraph 12. However, Claims 15-20 and 22 depend from claim 12, which Applicant has shown to be allowable. Hence, the cited portions of Gonen-Friedman and Caballero fail to disclose or suggest at least one element of each of claims 15-20 and 22. Accordingly, claims 15-20 and 22 are also allowable, at least by virtue of their dependence from claim 12.

Further, the dependent claims recite additional features that are not disclosed or suggested by the above-cited references. For example, the cited portions of Gonen-Friedman do not disclose or suggest that the multiple user-selectable links include a plurality of electronic mail addresses, as recited in claim 19. Instead, Gonen-Friedman discloses that a notification may be generated to notify one or more selected accounts receivable personnel of the vendor of a generation of a Credit Memo Request. *See* Gonen-Friedman, paragraph [0041]. Gonen-Friedman does not disclose or suggest multiple user-selectable links that include a plurality of electronic mail addresses. For this additional reason, claim 19 is allowable.

C. Claims 23, 26-31 and 33

The Office has rejected claims 23, 26-31 and 33, at paragraph 13 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Gonen-Friedman in view of Caballero. However, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest the specific combination of claim 23. For example, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest computer-readable program code to direct a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as in claim 23. The Office Action admits that Gonen-Friedman does not disclose that the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type. The Office asserts that the Abstract of Caballero discloses this feature. *See* Office Action, page 4. Applicant respectfully disagrees.

As explained above, Caballero discloses a system to access a customer's account information, service profile, quotes, and order. *See* Caballero, Abstract. Caballero teaches that account information can be entered and updated. Quotes are generated for various configurations of products and services. The quotes can then be converted to an order. *See* Caballero, Abstract. Accordingly, with Caballero, the system is not responsive to a user's questions regarding a transaction, as in claim 23. Instead, Caballero is directed to "processing complex orders" and to "validate customer orders for complex combinations of products and services." *See* Caballero, paragraph [0004]. Caballero does not disclose multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as in claim 23. Therefore, the cited portions of Gonen-Friedman and Caballero, separately or in combination, do not disclose or suggest every element of claim 23. Hence, claim 23 is allowable.

The Office Action rejected claims 26-31 and 33 as being unpatentable over Gonen-Friedman. *See* Office Action, paragraph 13. However, Claims 26-31 and 33 depend from claim 23, which the Applicant has shown to be allowable. Hence, the cited portions of Gonen-Friedman and Caballero fail to disclose or suggest at least one element of each of claims 26-31 and 33. Accordingly, claims 26-31 and 33 are also allowable, at least by virtue of their dependence from claim 23.

Further, the dependent claims recite additional features that are not disclosed or suggested by the above-cited references. For example, the cited portions of Gonen-Friedman do not disclose or suggest multiple user-selectable links for a line item that include a first link to question an amount of a product or a service associated with the line item and a second link to question a billing rate associated with the line item, as recited in claim 28. Instead, Gonen-Friedman discloses that the user can dispute <u>the invoice</u> (not a line item) in a first step (step S1) and select a reason code in a second step (step S2a). *See* Gonen-Friedman, paragraph [0037]. However, Gonen-Friedman does not disclose a first link to question an amount of a product or a service associated with the line item and a second link to question a billing rate associated with the line item, as in claim 28.

The cited portions of Gonen-Friedman do not disclose multiple user-selectable links that include a first link to question an amount of a product or a service associated with the line item and a second link to question a billing rate associated with the line item, where the amount is an amount of time, as recited in claim 29. Similarly, the cited portions of Gonen-Friedman do not disclose or suggest that the multiple user-selectable links include a plurality of electronic mail addresses, as in claim 30. Instead, Gonen-Friedman discloses that a notification may be generated to notify one or more selected accounts receivable personnel of the vendor of the generation of the Credit Memo Request. *See* Gonen-Friedman, paragraph [0041]. For these additional reasons, claims 28-30 are allowable.

II.   Claims 2, 3, 13, 14, 24, and 25 are Allowable

The Office has rejected claims 2, 3, 13, 14, 24, and 25, at paragraph 14 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent Application Publication No. 2001/0047332 ("Gonen-Friedman") in view of U.S. Patent Application Publication No.

2007/0203771 ("Caballero") and further in view of U.S. Patent Application Publication No. 2003/0051226 ("Zimmer"). Applicant respectfully traverses the rejections.

A. Claims 2 and 3

Claims 2 and 3 depend from claim 1, which Applicant has shown to be allowable. As explained above, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest each of the elements of claim 1. For example, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest providing a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as in claim 1. Further, Zimmer does not disclose or suggest this element of claim 1. Instead, Zimmer discloses a method of translating an abstract notation of an application to a series of sub-applications representing a central application. *See* Zimmer, Abstract. Therefore, Gonen-Friedman, Caballero and Zimmer, separately or in combination, do not disclose or suggest each and every element of claim 1, or of claims 2 and 3, which depend from claim 1.

Further, the Office Action admits that Gonen-Friedman and Caballero do not disclose or suggest processing an extensible Markup Language (XML) representation of each of the individual line items to create the line-by-line user interface, where the XML representation includes tags within which the multiple user-selectable links per line item are defined, as in claim 2. *See* Office Action, paragraph 15. In addition, Zimmer does not disclose or suggest this feature. Therefore, Gonen-Friedman, Caballero and Zimmer, separately or in combination, do not disclose or suggest this element of claim 2. Hence, for this additional reason, claim 2 is allowable.

B. Claims 13 and 14

Claims 13 and 14 depend from claim 12, which Applicant has shown to be allowable. As explained above, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest each of the elements of claim 12. Zimmer does not disclose or suggest the elements of claim 12 that are not disclosed or suggested by Gonen-Friedman and Caballero. For example, the cited

portions of Gonen-Friedman and Caballero do not disclose or suggest a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as in claim 12. Zimmer also does not disclose or suggest this element of claim 12. Instead, Zimmer discloses a method of translating an abstract notation of an application to a series of sub-applications representing a central application. *See* Zimmer, Abstract. Therefore, the cited portions of Gonen-Friedman, Caballero and Zimmer, separately or in combination, do not disclose or suggest each and every element of claim 12, or of claims 13 and 14, which depend from claim 12.

Further, the Office Action admits that Gonen-Friedman and Caballero do not disclose or suggest that the computer system includes a user interface creator to process an extensible Markup Language (XML) representation of each of the individual line items to create the line-by-line user interface, where the XML representation includes tags within which the multiple links per line item are defined, as in claim 13. *See* Office Action, paragraph 15. Additionally, Zimmer does not disclose or suggest this feature. Therefore, Gonen-Friedman, Caballero and Zimmer, separately or in combination, do not disclose or suggest this element of claim 13. Accordingly, for this additional reason, claim 13 is allowable.

C. Claims 24 and 25

Claims 24 and 25 depend from claim 23, which the Applicant has shown to be allowable. As explained above, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest each and every element of claim 23. Zimmer does not disclose or suggest the elements of claim 23 that are not disclosed or suggested by Gonen-Friedman. For example, Gonen-Friedman and Caballero do not disclose or suggest a computer-readable medium having computer-readable program code to direct a computer system to provide a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as in claim 23. Zimmer does not disclose or suggest this element of claim 23.

Instead, Zimmer discloses a method of translating an abstract notation of an application to a series of sub-applications representing a central application. *See* Zimmer, Abstract. Therefore, the cited portions of Gonen-Friedman, Caballero and Zimmer, separately or in combination, do not disclose or suggest each of the elements of claim 23, or of claims 24 and 25, which depend from claim 23.

Further, the Office Action admits that Gonen-Friedman and Caballero do not disclose or suggest that the computer-readable program code directs the computer system to process an extensible Markup Language (XML) representation of each of the individual line items to create the line-by-line user interface, wherein the XML representation includes tags within which the multiple links per line item are defined, as in claim 24. *See* Office Action, paragraph 15. Additionally, Zimmer does not disclose this feature. Therefore, the cited portions of Gonen-Friedman, Caballero and Zimmer, separately or in combination, do not disclose or suggest this element of claim 24. Accordingly, for this additional reason, claim 24 is allowable.

III.   Claims 10, 21 and 32 are Allowable

The Office has rejected claims 10, 21 and 32, at page 10 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent Application Publication No. 2001/0047332 ("Gonen-Friedman") in view of U.S. Patent Application Publication No. 2007/0203771 ("Caballero") and further in view of U.S. Patent No. 5,948,054 ("Nielson"). Applicant respectfully traverses the rejections.

Claims 10, 21 and 32 depend from claims 1, 12, and 23, respectively, which Applicant has shown to be allowable. As explained above, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest each and every element of claims 1, 12 and 23. For example, the cited portions of Gonen-Friedman and Caballero do not disclose or suggest providing a line-by-line user interface to enable a user to question individual line items in a transaction, where the user interface provides multiple user-selectable links to multiple destinations for multiple question types per line item to facilitate routing a user request to an appropriate destination based on its question type, as recited in claims 1, 12 and 23. Further, the cited portions of Nielson do not disclose or suggest this element of claims 1, 12 and 23. Instead, Nielson discloses a system in which a question is received from a human customer by a server,

and the server polls qualified human consultants for an answer. *See* Nielson, Abstract. If one of the qualified consultants decides to provide the requested information, the server receives the information and sends the information to the human customer via the customer's computer. *See* Nielson, Abstract. Therefore, the cited portions of Gonen-Friedman, Caballero and Nielson, separately or in combination, do not disclose or suggest each and every element of claims 1, 12 and 23 or of claims 10, 21 and 32, which depend from claims 1, 12 and 23, respectively. Hence, claims 10, 21 and 32 are allowable.
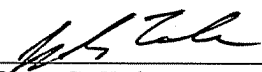
CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the cited portions of the references as applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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